

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRITISH COAL STAFF SUPERANNUATION
SCHEME; MINEWORKERS' PENSION SCHEME;
FÖRSTA AP-FONDEN; TAYSIDE
SUPERANNUATION FUNDS; INTERNATIONAL
FUND MANAGEMENT S.A.; DEKA
INTERNATIONAL S.A. LUXEMBURG; DEKA
INVESTMENT GmbH; and ETFLAB INVESTMENT
GmbH,

Plaintiffs,

v.

No. 12-CV-4555 (LTS) (DCF)

AMERICAN INTERNATIONAL GROUP, INC.;
MARTIN J. SULLIVAN; STEVEN J. BENSINGER;
JOSEPH CASSANO; ANDREW FORSTER; ALAN
FROST; DAVID HERZOG; ROBERT LEWIS;
MARSHALL A. COHEN; MARTIN S. FELDSTEIN;
ELLEN V. FUTTER; STEPHEN L. HAMMERMAN;
GEORGE L. MILES, JR.; MORRIS W. OFFIT;
JAMES F. ORR III; VIRGINIA ROMETTY;
MICHAEL H. SUTTON; EDMUND S.W. TSE;
FRANK G. ZARB;
PRICEWATERHOUSECOOPERS LLC;
CITIGROUP GLOBAL MARKETS INC.; CREDIT
SUISSE SECURITIES (USA) LLC; DEUTSCHE
BANK SECURITIES INC.; DOWLING &
PARTNERS SECURITIES, LLC; FOX-PITT
KELTON COCHRAN CARONIA WALLER (USA)
LLC; JP MORGAN SECURITIES INC.; KEEFE,
BRUYETTE & WOODS, INC.; MERRILL LYNCH,
PIERCE, FENNER & SMITH INCORPORATED;
and WACHOVIA CAPITAL MARKETS LLC,

Defendants.

**ORAL ARGUMENT
REQUESTED**

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Corrected Complaint
("Complaint"), filed July 9, 2012, a copy of which is annexed hereto and the
accompanying Memorandum of Law, Defendant PricewaterhouseCoopers LLP ("PwC")

(erroneously sued as PricewaterhouseCoopers LLC) hereby moves this Court, before the Hon. Laura Taylor Swain, at the United States Courthouse, Courtroom 12D, 500 Pearl Street, New York, New York, for an order, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b) and the Securities Litigation Uniform Standards Act of 1998, 15 U.S.C. § 78bb(f)(1), dismissing with prejudice the Complaint, as to Defendant PwC; and granting such other and further relief as the Court deems just and proper.

The undersigned counsel for PwC hereby certifies that we have complied with Rule 2(b)(i) of the Individual Practices of Judge Laura Taylor Swain by using our best efforts to resolve the matters raised in this motion informally. Our efforts were not successful. Plaintiffs have not amended their Complaint in response to the arguments raised in this motion.

January 20, 2015

CRAVATH, SWAINE & MOORE LLP,

by /s/ Antony L. Ryan

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